

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ITSERVE ALLIANCE, INC., *et al.*,

Plaintiffs,

v.

MARTIN J. WALSH, SECRETARY OF
LABOR, *et al.*,

Defendants.

HON. STANLEY R. CHESLER

Civil Action No. 2:20-cv-14604 (SRC)

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and in light of the remand and vacatur of the Department of Labor Final Rule at issue in this litigation—*Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens in the United States*, 86 Fed. Reg. 3608 (Jan. 14, 2021) (“Final Rule”)—in *Chamber of Commerce, et al. v. Department of Homeland Security, et al.*, 4:20-cv-07331-JSW (N.D. Cal.), Plaintiffs ITServe Alliance, Inc.; Dots Technologies, Inc.; Iflowsoft Solutions, Inc.; Kolla Soft Inc.; NAM Info, Inc.; Precision Technologies Corp.; Smart Works, LLC; and Zenith Services, Inc.; and Defendants Martin J. Walsh, in his official capacity as Secretary of Labor; and Lenita Jacobs-Simmons, in her official capacity as Acting Assistant Secretary for Employment and Training, having now settled this case, hereby stipulate to the dismissal of any and all claims against Secretary Walsh and Acting Assistant Secretary for Employment and Training Jacobs-Simmons, with prejudice.

Dated: September 24, 2021

Respectfully submitted,

BRIAN M. BOYNTON

Acting Assistant Attorney General
Civil Division

BRAD P. ROSENBERG
Assistant Director, Federal Programs Branch

s/ Laurel H. Lum
CAROL FEDERIGHI
Senior Trial Counsel
ALEXANDRA R. SASLAW
LAUREL H. LUM
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
Phone: (202) 305-8177
laurel.h.lum@usdoj.gov

Counsel for Defendants

Dated: September 27, 2021

s/Geoffrey Forney
GEOFFREY FORNEY
Wasden Bantias LLC
411 West Ellet Street
Philadelphia, PA 19119
202-615-8315/ geoff@wasdenbantias.com

Attorney for Plaintiffs